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7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 ELIZABETH WILLIS,

Case No.: 2:22-cv-00609-RFB-DJA

10 Plaintiff,

11  
12 **JOINT MOTION TO EXTEND**  
**DEADLINE TO RESPOND TO**  
**PLAINTIFF'S COMPLAINT (SECOND**  
**REQUEST)**

13 vs.  
14 TRANSUNION, LLC, EQUIFAX  
15 INFORMATION SERVICES, LLC, BERLIN-  
WHEELER, INC.,

16 Defendants.

17 Plaintiff, Elizabeth Willis (“Plaintiff”), and Defendant, Berlin-Wheeler, Inc. (“Defendant”)  
18 (collectively “Parties”), by and through their counsel of record, hereby stipulate and agree as  
19 follows:

20 On April 11, 2022, Plaintiff filed his Complaint [ECF No. 1]. Defendant was served with  
21 Plaintiff’s Complaint on April 18, 2022. The deadline for Defendant to respond to Plaintiff’s  
22 Complaint was May 9, 2022. After a joint motion of the parties, this Court extended the deadline  
23 to May 23, 2022 [ECF No. 13]. The Parties have discussed extending the deadline for Defendant  
24 to respond to Plaintiff’s Complaint to allow for further ongoing discussions of possible resolution  
25 of the matter.

26 WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Defendant to  
27 file their responsive pleading to Plaintiff’s Complaint to June 13, 2022.

28 This is the second motion for an extension of time for Defendant to file their responsive

1 As part of this motion, Defendant agrees to participate in any Rule 26(f) conference that  
2 occurs during the pendency of this extension.  
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5 DATED this 23rd day of May, 2022.  
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WRIGHT, FINLAY & ZAK, LLP

/s/ Ramir M. Hernandez

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CONTEMPORARY LEGAL SOLUTIONS

/s/ Robert M. Tzall

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Attorneys for Plaintiff, Elizabeth Willis

16 IT IS SO ORDERED:  
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19   
20 UNITED STATES MAGISTRATE JUDGE  
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23 DATED: May 24, 2022  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that I served the foregoing **JOINT MOTION TO EXTEND TIME TO RESPOND TO PLAINTIFF'S COMPLAINT (SECOND REQUEST)** on the 23rd day of May, 2022, to all parties on the CM/ECF service list.

/s/ Lisa Cox  
An Employee of WRIGHT, FINLAY & ZAK, LLP